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Company GUC Trust*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	: Chapter 11
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	: Case No.: 09-50026 (REG)
f/k/a General Motors Corporation, <i>et al.</i> ,	: (Jointly Administered)
Debtors.	:
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MOTORS LIQUIDATION COMPANY GUC TRUST,	:
Plaintiff,	: Adversary Proceeding
v.	: Case No.: 12-09802
APPALOOSA INVESTMENT LIMITED	:
PARTNERSHIP I; PALOMINO FUND LTD;	:
THOROUGHbred FUND LP; THOROUGHbred	:
MASTER LTD; THE LIVERPOOL LIMITED	:
PARTNERSHIP; ELLIOTT INTERNATIONAL LP;	:
DRAWBRIDGE DSO SECURITIES LLC;	:
DRAWBRIDGE OSO SECURITIES LLC; FCOF UB	:
SECURITIES LLC; AURELIUS INVESTMENT, LLC;	:
CITIGROUP GLOBAL MARKETS INC.; LMA SPC	:
FOR AND ON BEHALF OF THE MAP 84	:
SEGREGATED; KNIGHTHEAD MASTER FUND,	:
L.P.; KIVU INVESTMENT FUND LIMITED; CQS	:
DIRECTIONAL OPPORTUNITIES MASTER FUND	:
LIMITED; MORGAN STANLEY & CO.	:
INTERNATIONAL PLC; SG AURORA MASTER	:
FUND L.P.; THE CANYON VALUE REALIZATION	:
FUND (CAYMAN), LTD; ANCHORAGE CAPITAL	:

MASTER OFFSHORE LTD; ONEX DEBT :
 OPPORTUNITY FUND, LTD; REDWOOD MASTER :
 FUND LTD; COLLINS STEWART (CI) LTD; SPH :
 INVEST SA; CONSILIUM TREUHAND AG & BEATA :
 DOMUS ANSTALT; MARIA-DOROTHEA LAMINET; :
 CREDIT SUISSE AG; CHEVIOT ASSET :
 MANAGEMENT; ING. HUGO WAGNER; ALLIANZ :
 BANK FINANCIAL ADVISORS SPA; RUI MANUEL :
 ANTUNES GONCALVES ROSA; UBS AG, ZURICH :
 (SWITZERLAND); ALY AZIZ; JOHANNA :
 SCHOEFFEL; SIRDAR ALY AZIZ; CSS, LLC; JOSEF :
 SCHMIDSEDER; HERMANN DETTMAR AND :
 HELENE DETTMAR; CLAUS PEDERSEN; HFR RVA :
 ADVENT GLOBAL OPPORTUNITY MASTER :
 TRUST; THE ADVENT GLOBAL OPPORTUNITY :
 MASTER FUND; BANCA DELLE MARCHE SPA; :
 ORE HILL CREDIT HUB FUND LTD; BHALODIA :
 RV/RM/PATEL RG; BARCLAYS BANK PLC; :
 JPMORGAN SECURITIES LIMITED; INTESA :
 SANPAOLO SPA; INTESA SANPAOLO PRIVATE :
 BANKING SPA; CREDITO EMILIANO SPA; :
 UNICREDIT BANCA DI ROMA SPA; HUTCHIN :
 HILL CAPITAL C1, LTD.; DEUTSCHE BANK SPA; :
 BANCA POPOLARE DI VICENZA SCPA; CASSA :
 CENTRALE BANCA-CREDITO COOPERATIVO DEL :
 NORD EST SPA; BANCA DI CREDITO :
 COOPERATIVO DI ROMA SOCIETA :
 COOPERATIVA; BANK OF VALLETTA PLC; :
 BANCA DI CREDITO COOPERATIVO ABRUZZESE- :
 CAPPELLE SUL TAVO-SOCIETA COOPERTIVA; :
 UBS AG; PERA UGO; GARIBALDI ROSANNA; :
 CANYON VALUE REALIZATION FUND LP; :
 LYXOR/CANYON VALUE REALIZATION FUND :
 LIMITED; CANYON-GRF MASTER FUND LP; :
 PROSPECT MOUNTAIN FUND LIMITED; RED :
 RIVER BUSINESS INC.; GREEN HUNT WEDLAKE, :
 INC., as trustee for General Motors Nova Scotia Finance :
 Company; JOHN DOE NOS. 1-100; and JOHN DOE, :
 INC. NOS. 1-100, :

Defendants. :

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**COUNTER-STATEMENT TO GENERAL MOTORS
 LLC'S STATEMENT OF UNDISPUTED MATERIAL FACTS**

CONTENTS OF DOCUMENT FILED UNDER SEAL PURSUANT TO PARAGRAPH 4 OF THE
 PROTECTIVE ORDER, SO ORDERED ON APRIL 7, 2011 [DOCKET NO. 10059]